



City of Chicago
Richard M. Daley, Mayor

Department of Aviation

David R. Mosena
Commissioner

Chicago O'Hare
International Airport

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City of Chicago
DEPARTMENT OF AVIATION
Office of Intergovernmental Affairs
FACSIMILE COVER SHEET

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FAX Number (312) 894-3939 NEW FAX NUMBER - PLEASE NOTE

DATE:

Aug. 1, 1994PLEASE DELIVER THE FOLLOWING TRANSMITTAL
TO:Reed Thedt

FAX NO:

202-653-5402TOTAL NUMBER OF PAGES INCLUDING
COVER 2

FROM:

ROBERT J. REPEL

(Phone: 312-686-3557)

(FAX: 312-894-3939)

WARREN E. SILVER

(Phone: 312-686-3558)

(FAX: 312-894-3939)

ACTION TO BE TAKEN:

☐ Per your request☐ Please advise☐ Please take necessary action☐ Per our conversation☐ Please call me☐ For your approval☐ FYI

COMMENTS:

If you do not receive total transmission, please call Ina Cruse
(312) 686-3562 or Shari Jones (312) 686-3559. Thank you.

WOP-18

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TELEFAX COMMUNICATION (312) 890-2562

COOK COUNTY DEPARTMENT OF CORRECTIONS
2700 SOUTH CALIFORNIA AVENUE
CHICAGO, IL 60608
(312) 890-6876

MICHAEL F. SHEAHAN
SHERIFF

J.W. FAIRMAN, JR.
EXECUTIVE DIRECTOR

=====

DATE: 8-1-94 (202) TO:
Chairman Reed Hundt FAX NUMBER: 418-2801Federal Communications CommissionFROM: J. W. Fairman, Jr. PAGES TO FOLLOW: 2
Executive Director**!!!! COMMENTS !!!!**

92-77

KB



**COOK COUNTY
DEPARTMENT
OF
CORRECTIONS**

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MICHAEL J. SHEAHAN
Sheriff
J. W. FAIRMAN, JR.
Executive Director

2700 South California Avenue / Chicago, Illinois 60608 / 312-890-6876

July 25, 1994

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AUG 12 1994

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

**The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554**

Dear Chairman Hundt:

The purpose of this letter is to voice opposition to the proposed introduction of Billed Party Preference (BPP) at correctional facilities. BPP, while it may benefit ordinary users, will detriment the security and control of operations if applied to the phone use of inmate populations. Specifically:

(1) BPP will disable the continuation of a working relationship with a single carrier. This relationship is important in that it enables comforting levels of trust and confidence in service. The benefit of a single carrier rests in contractual obligation, commitment and experience, all of which will be lost if carriers can be freely selected.

(2) BPP will eliminate a source of current revenue which ensures the provision and maintenance of quality phone equipment. Without this revenue, quality assurance is threatened and the possibility of inoperative inmate phones is considerable. This possibility has serious implications on our ability to effectively manage and control inmates in the event of discontinued or disrupted phone service.

(3) A purpose of BPP, to ensure fair rates, can be achieved in correctional facilities without the imposition of BPP. A more effective and less consequential solution would be to introduce rate ceilings on all inmate calls and to require agencies to enforce and ensure these ceilings through independent contracts. In this way, the introduction of price control could not be at the expense of existing operational benefits.

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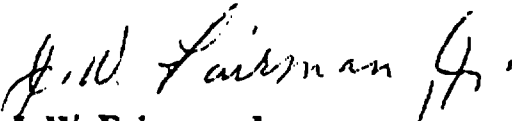
The Honorable Recl E.Hundt

Page Two

7/25/94

These implications suggest that BPP, while it may solve one problem, will actually introduce several others in the process. Any and all reconsideration of this initiative is appreciated.

Sincerely,

A handwritten signature in cursive script, reading "J. W. Fairman, Jr.", with a stylized flourish at the end.

**J. W. Fairman, Jr.
Executive Director**

JWF/pjh



23860

Paul R. Nicholson
SHERIFF

City of Hopewell Virginia

OFFICE OF THE SHERIFF

P.O. BOX 1193

HOPEWELL, VA 23860

(804) 541-2300

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AUG 12 1994



MEMBER OF VIRGINIA
STATE SHERIFF'S ASSN.

JULY 27, 1994

The Honorable Susan Ness
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

Re: CC Docket No.92-77 Opposition to Billed Party Preference

Dear Commissioner Ness

WE ARE OPPOSED TO THE APPLICATION OF BILLED PARTY PREFERENCE (BPP) AT INMATE FACILITIES.

We have analyzed the security and administration needs at our facility, the **Hopewell City Jail**, and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and a few that will be trained to handle inmate calls. We see our Inmate Phone Technician "Bob Mitchell" three times a week when he comes by our facility. Bob drops by to update the equipment or just to be sure everything is operating smooth. Bob has become a friend of ours and he knows our needs.

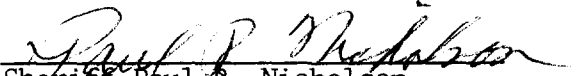
We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls and other criminal activity over the telephone network. We just had our equipment installed in the last year. Before the equipment was installed we were receiving complaints from citizens through out the state who were receiving unwanted phone calls from our inmates. Before a murder trial a key witness for the state received threatening phone calls, believed to have been made by inmate(s) incarcerated in our facility. We have seen phone bills coming to inmates for \$1,000.00's where they had used their or a stolen Calling Card. In some instances one of the inmates would get a calling card number and pass it through out the facility. With the Inmate Phone System we have now, we are able to stop all of these problems and more if they should arise. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us like Bob Mitchell does. Without inmate phone the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

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Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable. Our facility has not received any complaints from the inmate's family due to the cost.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions --- decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,


Sheriff Paul R. Nicholson